
EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| OHVA, Inc., Plaintiff, v. Ace Merchant Processing, LLC, Defendant. | Case No. 4:20-cv-1244-KPE Patent Case Jury Trial Demanded |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|

PLAINTIFF'S MOTION FOR SUBSTITUTE SERVICE

Plaintiff, OHVA, Inc., asks the court to authorize substitute service as to Ace Merchant Processing, LLC, C/o Farzeen Mehta ("Defendant") and would show unto the Court as follows.

1. Defendant's primary address is 12869 Capricorn Street, Stafford, TX 77477.
2. Plaintiff makes this request in light of the COVID-19 pandemic, given that normal service of process involves bringing the process server into close proximity with the agent of the Defendant. Additionally, process servers are generally declining to serve process by normal means. *See, e.g.,* <https://www.abcllegal.com/covid-19>.
3. Plaintiff asks the court to authorize to Plaintiff to serve Defendant by any one of the following methods:
 - a. By Delivering via Registered Mail a true copy of the Summons in a Civil Action and Complaint for Patent Infringement and Order authorizing substituted service attached, to 12869 Capricorn Street, Stafford, TX 77477, **OR**,
 - b. By Attaching a true copy of the Summons in a Civil Action and Complaint for Patent Infringement and Order authorizing substitute service, securely to the

front door or entry way at 12869 Capricorn Street, Stafford, TX 77477.

4. Plaintiff asserts to the Court that the manner of service ordered herein will be reasonably effective to give said Defendant notice of the lawsuit.

WHEREFORE, Plaintiff requests that the motion for substitute service be Granted.

Dated: April 14, 2020

Respectfully submitted,

/s/ Isaac Rabicoff

Isaac Rabicoff

Rabicoff Law LLC

73 W Monroe St

Chicago, IL 60603

(773) 669-4590

isaac@rabilaw.com

Counsel for Plaintiff

OHVA, Inc.